

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

IN RE:

**LILLIAN ROSE FILLINGAME
xxx-xx-6230
6460 Second Street
Saratoga, Texas 77585**

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**CAUSE NO. 11-10451
(CHAPTER 13)**

DEBTOR

**OBJECTION TO PROOF OF CLAIM #12
OF PENNY CORLEY**

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

COMES NOW, the MAIDA LAW FIRM, P.C., attorneys for LILLIAN ROSE FILLINGAME, the above named Debtor and objects to proof of claim #12 filed by PENNY CORLEY on December 7, 2011, in the total amount of \$50,000.00, and hereby submit the following:

1. The claim, attached hereto as Exhibit "A", is a duplicate to Proof of Claim #11, filed on December 7, 2011.
2. Proof of Claim #12 should thus be disallowed. (A supporting Affidavit is attached hereto as Exhibit "B".)

WHEREFORE, LILLIAN ROSE FILLINGAME prays that proof of claim #12 filed by the PENNY CORLEY on December 7, 2011 be disallowed, and for such other and further relief as is just.

DATED: December 13, 2011

Respectfully submitted,

**MAIDA LAW FIRM, P.C.
4320 Calder Avenue
Beaumont, Texas 77706
(409) 898-8200; fax (409) 898-8400**

BY: /s/ Tagnia Fontana Clark
Tagnia Fontana Clark
State Bar No. 24007194

ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Objection has been properly forwarded to all interested parties via electronic mail or regular U.S. Mail on this the 13th day of December, 2011.

/s/ Tagnia Fontana Clark

Tagnia Fontana Clark

Ms. Penny Corley
c/o Brett S. Thomas, attorney
476 Oakland Street
Beaumont, Texas 77701

Mr. John Talton
Chapter Thirteen Trustee
110 N. College Ave., 12th Floor
Tyler, Texas 75702

Mr. Michael Reed
McCreary, Veselka, Bragg & Allen, P.C.
P. O. Box 1269
Round Rock, Texas 78680

Recovery Management Systems
Attn: Ramesh Singh
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605